

# **EXHIBIT A**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

E. JEAN CARROLL, )  
Plaintiff, )  
-against- ) 20-cv-7311 (LAK)  
DONALD J. TRUMP, in his )  
personal capacity, )  
Defendant. )  
\_\_\_\_\_ )

\*\*\*CONFIDENTIAL\*\*\*  
VIDEOTAPED DEPOSITION OF  
E. JEAN CARROLL  
New York, New York  
Friday, October 14, 2022

Reported By:  
CATHI IRISH, RPR, CRR, CLVS

1 CARROLL - CONFIDENTIAL

2 she's swollen with happiness. That's a  
3 prime example.

4 Q. At what point did you decide to  
5 file a lawsuit against the defendant?

6 A. Well, wherever I went after the  
7 story went people said are you going to  
8 sue him, are you going to sue him and I  
9 would say no, no, no, not going to do it.  
10 I'm just not -- and then I had a  
11 conversation with someone who knew the ins  
12 and outs, an actual lawyer, and he said  
13 you should really seriously think about  
14 this.

15 Q. Who was that lawyer without  
16 getting into the conversation?

17 A. George Conway.

18 Q. How did you meet George Conway?

19 A. Met him at a party at Molly  
20 Jong-Fast's house.

21 Q. Was he your lawyer at the time?

22 A. No, no, no, no.

23 Q. Where was that?

24 A. Manhattan, 83rd Street or 84th  
25 Street.

1 CARROLL - CONFIDENTIAL

2 A. No.

3 Q. So after you spoke to George, did  
4 you retain counsel?

5 A. Yes.

6 Q. How soon after?

7 A. The day after. The day -- two  
8 days later.

9 Q. Did George recommend Ms. Kaplan?

10 A. Yes, he did.

11 Q. Are you presently paying your  
12 counsel's fees?

13 A. This is a contingency case.

14 Q. So you're not paying expenses or  
15 anything out of pocket to date; is that  
16 correct?

17 A. I'm not sure about expenses. I  
18 have to look that up.

19 Q. Is anyone else paying your legal  
20 fees, Ms. Carroll?

21 A. No.

22 Q. You speak a lot about the Adult  
23 Survivors Act being passed and we've  
24 discussed numerous people who have  
25 attacked you, assaulted you; is that

CARROLL - CONFIDENTIAL

C E R T I F I C A T E

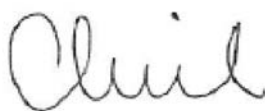
STATE OF NEW YORK       )  
                                      : ss.  
COUNTY OF NASSAU       )

I, CATHI IRISH, a Registered  
Professional Reporter, Certified Realtime  
Reporter, and Notary Public within and for  
the State of New York, do hereby certify:

That E. JEAN CARROLL, the witness  
whose deposition is hereinbefore set  
forth, was duly sworn by me and that such  
deposition is a true record of the  
testimony given by the witness.

I further certify that I am not  
related to any of the parties to this  
action by blood or marriage, and that I am  
in no way interested in the outcome of  
this matter.

IN WITNESS WHEREOF, I have hereunto  
set my hand this 17th day of October,  
2022.



CATHI IRISH, RPR, CRR, CLVS